

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

ROGELIO OROZCO, R26820,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	No. 16-1179-GCS
	)	
KIMBERLY BUTLER, MINH SCOTT,	)	
ERIN CARTER, REBECCA COWAN,	)	
SCOTT HOLTE, ABERARDO	)	
SALINAS, RANDY PFISTER, JASON	)	
HART, and JACQUELINE LASHBROOK	)	
	)	
Defendants.	)	

**DEFENDANTS' RULE 26(a)(3) DISCLOSURES**

COME NOW Defendants, KIMBERLY BUTLER, MINH SCOTT, ERIN CARTER, REBECCA COWAN, SCOTT HOLTE, ABERARDO SALINAS, RANDY PFISTER, JASON HART, and JACQUELINE LASHBROOK, by and through their attorney, Kwame Raoul, Attorney General of the State of Illinois, and pursuant to Fed. R. Civ. P. 26(a)(3), hereby provide their Rule 26(a)(3) Disclosures:

A. Witnesses Defendants expect to present at trial:

- a. **Rogelio Orozco:** #R-26820, c/o Colby Qualls, Forester Haynie, PLLC, 400 North Saint Paul Street, Suite 700, Dallas, TC 75201. Mr. Orozco is the Plaintiff in this matter. He is capable of testifying about the allegations in his Complaint.
- b. **Kimberly Butler:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Ms. Butler is named as a Defendant in this matter. She is capable of testifying about the allegations against her in Plaintiff's Complaint. She may also testify to and has knowledge of IDOC rules, policies, and procedures at Menard Correctional Center.
- c. **Rebecca Cowan:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Ms. Cowan is named as a Defendant in this matter. She is capable of testifying about the allegations against her in Plaintiff's Complaint. She may also testify to and has knowledge of IDOC rules, policies, and procedures at Menard Correctional Center.

- d. **Erin Carter:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Ms. Carter is named as a Defendant in this matter. She is capable of testifying about the allegations against her in Plaintiff's Complaint. She may also testify to and has knowledge of IDOC rules, policies, and procedures at Menard Correctional Center.
- e. **Jacqueline Lashbrook:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Ms. Lashbrook is named as a Defendant in this matter. She is capable of testifying about the allegations against her in Plaintiff's Complaint. She may also testify to and has knowledge of IDOC rules, policies, and procedures at Menard Correctional Center.
- f. **Jason Hart:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Mr. Hart is named as a Defendant in this matter. He is capable of testifying about the allegations against him in Plaintiff's Complaint. He may also testify to and has knowledge of IDOC rules, policies, and procedures at Menard Correctional Center.
- g. **Minh Scott:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Mr. Scott is named as a Defendant in this matter. He is capable of testifying about the allegations against him in Plaintiff's Complaint. He may also testify to and has knowledge of IDOC rules, policies, and procedures at Menard Correctional Center.

B. Witnesses Defendants will call only if the need arises:

- a. **Scott Holte:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Mr. Holte is named as a Defendant in this matter. He is capable of testifying about the allegations against him in Plaintiff's Complaint. He may also testify to and has knowledge of IDOC rules, policies, and procedures at Pontiac Correctional Center.
- b. **Aberardo Salinas:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Mr. Salinas is named as a Defendant in this matter. He is capable of testifying about the allegations against him in Plaintiff's Complaint. He may also testify to and has knowledge of IDOC rules, policies, and procedures at Pontiac Correctional Center.
- c. **Randy Pfister:** c/o Illinois Attorney General, 201 West Pointe Dr., Suite 7, Swansea, IL 62226. Mr. Pfister is named as a Defendant in this matter. He is capable of testifying about the allegations against him in Plaintiff's Complaint. He may also testify to and has knowledge of IDOC rules, policies, and procedures at Pontiac Correctional Center.

- d. Records Custodian:** Menard Correctional Center, 711 Kaskaskia Street, Menard, IL 62259. The Records Custodian has knowledge of the recordkeeping procedures at Menard Correctional Center.
- e. Records Custodian:** Western Illinois Correctional Center, 2500 Route 99 South, Mount Sterling, IL 62353. The Records Custodian has knowledge of the recordkeeping procedures at Western Illinois Correctional Center.
- f. Medical Records Custodian:** Western Illinois Correctional Center, 2500 Route 99 South, Mount Sterling, IL 62353. The Medical Records Custodian has knowledge of the medical recordkeeping procedures at Western Illinois Correctional Center.

C. Witnesses Defendants expect to present by deposition:

- a. None.

D. Exhibits

- a. Exhibits Defendants expect to offer at trial.

- 1. Plaintiff's Disciplinary Tickets records, Bates stamped Nos. 000132-000164
- 2. Plaintiff's Administrative Review Board Records, Bates stamped Nos. 000001-000081

- b. Exhibits Defendants will offer only if the need arises:

- 1. Plaintiff's First Amended Complaint (Court Doc. 10);
- 2. Plaintiff's Second Amended Complaint (Court Doc. 85);
- 3. Plaintiff's deposition;
- 4. Plaintiff's Grievances and Responses, Bates stamped Nos. 000103-000131; and
- 5. Plaintiff's Cumulative Counseling Summary, Bates stamped Nos. 000083-000102.

Defendants may introduce any other documents produced in discovery, any documents identified by Plaintiff as exhibits, documents placed on the record by Plaintiff, and any affidavits by Plaintiff or witnesses.

Respectfully submitted,

KIMBERLY BUTLER, MINH SCOTT, ERIN  
CARTER, REBECCA COWAN, SCOTT HOLTE,  
ABERARDO SALINAS, RANDY PFISTER,  
JASON HART, and JACQUELINE LASHBROOK,

Defendants,

KWAME RAOUL, Attorney General,  
State of Illinois,

Attorney for Defendants,

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By: s/Tara M. Barnett  
TARA M. BARNETT, #6327008  
Assistant Attorney General

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HART, and JACQUELINE LASHBROOK	)	
	)	
Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on July 25, 2023, the foregoing document, ***Defendants' Rule 26(a)(3) Disclosures***, was electronically filed with the Clerk of the Court using the CM/ECF system which will electronically send notice to:

Colby Qualls	ecfnotices@sanfordlawfirm.com
Josh Sanford	ecfnotices@sanfordlawfirm.com

I further hereby certify that on the same date, I have mailed by United States Postal Service the document to the following non-registered participant:

None

Respectfully submitted,

s/Tara M. Barnett  
Tara M. Barnett #6327008  
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